

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re	§	Chapter 11
	§	
CORE SCIENTIFIC, INC.	§	Case No. 22-90341 (DRJ)
<i>et al.</i> ¹ ,	§	
	§	
DEBTORS.	§	(Jointly Administered)

**NOTICE OF PERFECTION OF MECHANIC’S LIEN OF HUBAND-MANTOR
CONSTRUCTION, INC. PURSUANT TO 11 U.S.C. § 546(b)**

Huband-Mantor Construction, Inc. (“Huband”) by and through the undersigned counsel, hereby provides notice of perfection, maintenance, and/or continuation of rights in a materialman’s and mechanic’s lien in accordance with sections 362(b)(3) and 546(b)(2) of title 11 of the United States Code (the “Bankruptcy Code”).

1. Prior to the commencement of these cases on December 21, 2022 (the “Petition Date”), Huband and Core Scientific, Inc. (“Core Scientific”) entered into a contract wherein Huband provided labor, materials, equipment, and tools furnished for the construction of data processing center, buildings, drives, and related improvements to the real property located in Reeves County, Texas (the “Cottonwood Project”), as more fully set forth and described in the Lien Filing (as defined below).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisitions, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisition I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

2. The total amount due and owing to Huband, pursuant to Texas Statutory Liens, up through December 21, 2022 (the “Petition Date”), for the Cottonwood Project is at least **\$15,603,889.45**, exclusive of accruing interest, attorney’s fees and other charges.

3. The interest perfected, maintained, and/or continued by the Lien Filing (as defined below), extends in and to the Real Property, improvements, and/or leasehold interest in the Real Property. A true and correct copy of Huband’s Affidavit for Mechanic’s Lien (the “Lien Filing” and such lien, the “Cottonwood Lien”) is attached as **Exhibit A** hereto.

4. In accordance with sections 362(b)(3) and 546(b)(2) of the Bankruptcy Code, Huband hereby provides notice to all parties in interest registered to receive electronic notice in these cases of the Cottonwood Lien. Huband is filing this notice out of an abundance of caution to preserve, perfect, maintain, and continue its rights in the Real Property, improvements, and/or leasehold interest in the Real Property under Texas state law. Huband intends to enforce the Cottonwood Lien rights to the fullest extent permitted by applicable law and reserves its rights to amend or supplement the Cottonwood Lien and any other claims against the Debtors.

5. Huband files this notice out of an abundance of caution and does not admit that such filing is required under applicable law. This filing relates only to the Cottonwood Lien and does not address Huband’s other mechanic’s and materialman’s liens against the Debtors and their property. Huband reserves all rights to amend and/or supplement this notice and to file similar notices with respect to its other mechanic’s liens.

Dated: January 27, 2023

Respectfully submitted,

COKINOS | YOUNG

10999 IH-10 West, Suite 800
San Antonio, Texas 78230
(210) 293-8700 (Telephone)
(210) 293-8733 (Facsimile)

By: /s/ Jay K. Farwell

Stephanie O'Rourke

State Bar No.: 15310800

Email: sorourke@cokinoslaw.com

Jay K. Farwell

State Bar No. 00784038

Email: jfarwell@cokinoslaw.com

**COUNSEL FOR CREDITOR HUBAND-
MANTOR CONSTRUCTION, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2023, a true and correct copy of the foregoing Notice of Perfection of Mechanic's Lien of Huband-Mantor Construction, Inc. Pursuant to 11 U.S.C. § 546(B) was served on all parties entitled to service via this court's ECF filing.

/s/ Jay K. Farwell

JAY K. FARWELL